

**United States Bankruptcy Court**  
**Eastern District of Pennsylvania**

In re

**Tatyna Petrosov**

Debtor

Case

No.

Chapter

**19-16061/amc**

**13**

**RESPONSE TO MOTION FOR RELIEF OF**  
**THE BANK OF NEW YORK MELLON ET AL**

Debtor, Tatyna Petrosov by her counsel,, Bradly E. Allen files this Response as follows:

1. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
2. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
3. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
4. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
5. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
6. Admitted.
7. Admitted.
8. Admitted.
9. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
10. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
11. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
12. Admitted.
13. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
14. Denied. It is specifically denied that the Debtor is behind on arrears post-petition for payments due from December 1, 2020 through September 1, 2021. To the contrary, Debtor states that she made most of her mortgage payments during the aforementioned time period with the exception of the months of December/2020,

February/2021, April/2021, and June/2021. As a result, the averments in this paragraph are therefore deemed denied.

15. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.

WHEREFORE, Debtor request this Honorable Court to deny the Motion for Relief of The Bank of New York Mellon, et al.

Respectfully submitted,

/s/Bradly E. Allen, Esquire  
**Attorney for Debtor, Tatyna Petrosov**

**United States Bankruptcy Court**  
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**ORDER**

AND NOW, this            day of            , 2021 upon Motion of The  
Bank of New York Mellon fka The Bank of New York, et al and Debtor's Response  
it is hereby:

ORDERED that the Motion for Relief of The Bank of New York Mellon fka The  
Bank of New York, et al is denied.

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HONORABLE ASHELY M. CHAN  
U.S. BANKRUPTCY JUDGE